

From: Megan Bennett <Mbenett@kreindler.com>
Sent: Saturday, September 25, 2021 1:37 PM EDT
To: Steven R. Pounian <Spounian@kreindler.com>
Subject: RE: Pounian Declaration SRP EDITS
Attachment(s): "Netburn 2021 8-30 Order re Michael Isikoff declarations.pdf"

Yes – we can say that. I was sticking to the “only answer what she asked for” because I’m so irritated by this – but probably better to add that to everyone’s declarations and try to avoid yet another of the court’s shots across our bow.

I’m good with your changes, though what I had in para 7 of your declaration mirrored the language of the court order (attached here). I am fine changing it or keeping as it was – whatever you think.

I left JF a voicemail earlier to ask him the same things you emailed him about. I will edit his declaration once we hear back. We also need to find out from JPK how many times he talked to Isikoff, if he can recall when and what they discussed.

Also, everyone should understand that they need to be sure that the declarations are correct and that they can stand by all of the statements if they were to testify under oath in court – I am sure the answer is yes, but will confirm with each declarant individually.

Thanks
Megan

From: Steven R. Pounian
Sent: Saturday, September 25, 2021 1:29 PM
To: Megan Bennett <Mbenett@kreindler.com>
Subject: Pounian Declaration SRP EDITS

I made changes attached. I can help on the others once we agree on a form. Can’t everyone say “I have no idea how Michael Isikoff got the transcript”?